



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

July 25, 2019

MEMORANDUM: Child-Resistant Effectiveness and Senior Adult Use Effectiveness Packaging  
Evaluation for Child Resistant Packaging (CRP)

Subject: Name of Pesticide Product: RD 1870 Herbicide  
EPA File Symbol: 71995-AR  
DP Barcode: D452394  
Decision #: 545751  
Action Code: R300  
PC Code: 032201 Diquat Dibromide  
103604 Glyphosate, aluminium salt  
Fill Volume: 1.5oz

From: Nathan Mellor, CRP Reviewer  
Fungicide Herbicide Branch  
Registration Division (7505P)

Through: Lindsay Roe, CRP Reviewer  
Fungicide Branch  
Registration Division (7505P)

To: Sarah Meadows, Risk Manager  
Herbicide Branch  
Registration Division (7505P)

Applicant: Monsanto Company  
1300 I (Eye) Street, NW – Suite 450 East  
Washington, DC 20005

FORMULATION FROM THE PRODUCT LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Glyphosate	73.3
Diquat Dibromide	2.9
<u>Other Ingredient(s):</u>	23.8
Total: 100.0%	

**BACKGROUND:** Monsanto has submitted a certification letter for Child Resistant Effectiveness (CRE) data and Senior Adult Use Effectiveness (SAUE) in support of EPA File Symbol 71995-AR, RD 1870 Herbicide. The registrant has a proposed fill volume of 1.5 oz. The product is for homeowner use on lawns and ornamentals. The testing was completed by National Child Resistance Testing, Inc.

**DESCRIPTION OF PACKAGING:** The packaging tested in each study was a 4 3/16 in X 5 3/4 in pouch that requires scissor to open. The opening instructions direct the user to 'cut here' with a scissor symbol at the top of the pouch.

**COMMENTS AND RECOMMENDATIONS:** The certification statement states that the 40 CFR Part 157 requirements for this product have been fulfilled including the revised standards in 16 CFR 1700.15(b) when tested by the revised testing procedures in 16 CFR 1700.20.

The SAUE test was conduct with empty packaging. The purpose of the test is to assure seniors can open the packaging, which should be done without significant exposure to the pesticide. Empty packaging would assure seniors could open the package but not that that the package would be opened without significant exposure. At this time, it is not recommend that the packaging be approved as CRP.